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February 27, 2009

Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission 445 12th Street, SW Suite TW-A325 Washington, DC 20554

Re: EB Docket 06-36, CPNI Certification for 2009

Dear Ms. Dortch:

Enclosed for filing is Mohave Cellular Limited Partnership's Annual 64.2009(e) CPNI Certification, dated February 27, 2009, as ordered in EB Docket 06-36.

If you have questions, please do not hesitate to contact me.

Sincerely,

Kevin Saville

Associate General Counsel

2378 Wilshire Blvd.

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Enclosure

cc: Best Copy and Printing, Inc., 445 12th Street, SW, Room CY-B402,

Washington, DC 20554, via e-mail to: fcc@bcpiweb.com

MOHAVE CELLULAR LIMITED PARTNERSHIP ANNUAL SECTION 64.2009(e) CERTIFICATION EB Docket No. 06-36

Company Name: Mohave Cellular Limited Partnership

Form 499 Filer ID: 823712

Name of Signatory: Daniel J. McCarthy

Title of Signatory: Executive Vice President & Chief Operating Officer

Date Filed: February 27, 2009

I, Daniel J. McCarthy, hereby certify that I am a duly authorized officer of Frontier Communications Company, the sole member company for CU Wireless Company LLC, which, in turn, is the General Partner in Mohave Cellular Limited Partnership ("Mohave Wireless" or the "Company"). In accordance with the terms of the underlying partnership agreement and acting as an agent of Mohave Wireless, I certify that I have personal knowledge that Mohave Wireless has established operating procedures that are adequate to ensure compliance with the CPNI rules of the Federal Communications Commission, codified at 47 C.F.R. 64.2001-64.2011, implementing Section 222(c) of the Communications Act of 1934, as amended.

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that Mohave Wireless is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules. Mohave Wireless did not receive any customer complaints in 2008 concerning the unauthorized release of CPNI. The Company did not take any actions against data brokers in 2008.

Daniel J. McCarthy

MOHAVE CELLULAR LIMITED PARTNERSHIP ACCOMPANYING STATEMENT - SECTION 64.2009(e) CERTIFICATION EB Docket No. 06-36

In accordance with 47 C.F.R. § 64.2009(e), the following statement accompanies the officer compliance certificate and explains how the operating procedures of Mohave Cellular Limited Partnership ("Mohave Wireless") ensure that the Company is in compliance with the Commission's CPNI rules, as codified at 47 C.F.R. §§ 64.2001-64.2011.

- Only authorized Mohave Wireless employees can access CPNI. Company
 personnel so authorized, such as customer service representatives, are trained regarding
 the appropriate access to, use of, and disclosure of CPNI. Failure to abide by the
 applicable policies and procedures is cause for discipline, up to and including
 termination.
- 2. Mohave Wireless' managerial personnel monitor access to, use of, and disclosure of CPNI on an on-going basis to ensure compliance with the applicable policies and procedures and to evaluate their effectiveness.
- 3. Mohave Wireless has implemented reasonable processes and procedures to discover and protect against attempts to gain unauthorized access to CPNI. Mohave Wireless authenticates a customer's identity prior to disclosing CPNI based on a customer-initiated telephone contact, on-line account access, or a retail center visit. Mohave Wireless has implemented necessary processes and procedures to notify customers when certain account changes are made.
- 4. Mohave Wireless has implemented supervisory processes to ascertain whether customer CPNI will be used in marketing efforts and whether customer approval for the use of CPNI is required under the Commission's CPNI rules.
- 5. Mohave Wireless employees involved in marketing are trained as to what information and when CPNI may be used to market services to customers and what information and when CPNI may not be used under the Commission's CPNI rules to market services to customers. All marketing campaigns that utilize CPNI are subject to supervisory approval. Records related to marketing campaigns that utilize CPNI are maintained for at least one year.

- 6. Mohave Wireless has implemented processes and procedures to prohibit the disclosure of CPNI to joint venture partners or independent contractors for the purpose of marketing communications-related services outside a customer's total services.
- 7. Mohave Wireless provides CMRS services. Mohave Wireless does not currently use, disclose or permit access to CPNI in a manner that requires prior customer approval. Mohave Wireless uses CPNI without customer approval solely in the provision services to which that customer already subscribes, including the services and products enumerated in the Commission's rules as within the customer's total services, as well as those purposes enumerated in Section 222(d) of the Act.
- 8. Mohave Wireless has implemented processes and procedures to prevent the unauthorized release of customer call detail information it maintains. Mohave Wireless will not release call detail information during a customer initiated telephone call unless (1) Mohave Wireless, at the customer's request, sends the call detail information to the customer's established address of record or (2) Mohave Wireless calls the telephone number of record to disclose the call detail information. If the customer is able to provide without assistance from Mohave Wireless personnel all of the call detail information necessary to address a customer service issue, then Mohave Wireless personnel are permitted to proceed with its routine customer care procedures in relation to the provided call detail information. In addition, Mohave Wireless does not release call detail information to a customer during a retail center visit unless the customer provides a valid photo identification.
- 9. Mohave Wireless has implemented processes and procedures to first inform federal law enforcement agencies, followed up by notification to affected customers, after reasonable determination of a breach of its customers' CPNI in accordance with FCC rules.